From: Robert Geller
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:24:45 PM

To whom it may concern:

I am an American citizen living in Tokyo.
I'm writing to **oppose** your proposed rule (Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50).

I think:
1) you should make compliance mandatory, not optional;
2) beef up your rule to set a 5 year recusal period for people with substantial interests;
3) delete the offensive examples involving asexual harasser;
4) allow 501(c)(3) orgs to hire legal counsel for whistleblowers.

Thank you for listening.

Sincerely,
Robert Geller

Bob Geller (Tokyo)